

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

PETER SCHULTZ and)	
DAVID MACK)	
)	11-CV-6225
Plaintiffs,)	
)	
vs.)	
)	Judge Hibbler
BAC HOME LOANS SERVICING, LP.)	Magistrate Judge Kim
)	
Defendant.)	

PARTIES' JOINT INITIAL STATUS REPORT

Plaintiffs Peter Schultz and David Mack, represented by counsel from Burke Law Offices, LLC, and Defendant BAC Home Loans Servicing, LP, represented by counsel from Reed Smith LLP, hereby submit this joint report pursuant to Fed. R. Civ. P. 26(f). The Court has set an initial status conference on November 17, 2011 at 9:30 a.m. The Parties state as follows:

1. Proposed Discovery Plan

a. No discovery has yet been taken by any of the Parties. However, the Parties do intend to take discovery following the guidelines set forth below.

b. **Rule 26(a)(1) Disclosures:** November 18, 2011

c. **Fact Discovery Completion:** May 31, 2012

d. **Expert Disclosures:**

i. Plaintiff's Expert Disclosure: June 28, 2012

ii. Plaintiff to Produce Experts For Deposition: July 12, 2012

iii. Defendant's Expert Disclosure: August 9, 2012

iv. Defendants to Produce Experts for Deposition: August 23, 2012

v. Plaintiff's Rebuttal Deadline: September 13, 2012

e. **Deadline to Amend Pleadings/Join Other Parties:** February 28, 2012

f. **Filing Dispositive Motions:** October 11, 2012

g. **Filing of a Final Pretrial Order:** November 15, 2012

2. Settlement

Plaintiffs made a settlement offer and Defendant responded with a counter offer. Plaintiffs rejected that offer and have made a counter offer.

3. Consent

The Parties do not unanimously consent that this case may be tried by the assigned Magistrate Judge.

Date: November 15, 2011

<u>s/ Gary S. Caplan</u> Gary S. Caplan One of the Attorneys for Defendant Gary S. Caplan Timothy R. Carraher Reed Smith LLP 10 S. Wacker Dr. 40th Floor Chicago, Illinois 60606 (312) 207-1000 <i>Counsel for Defendants</i>	<u>/s/Alexander H. Burke</u> BURKE LAW OFFICES, LLC 155 N. Michigan Ave., Suite 9020 Chicago, IL 60601 (312) 729-5288 (312) 729-5289 (fax) <u>www.BurkeLawLLC.com</u>
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CERTIFICATE OF SERVICE

I, Timothy R. Carraher, hereby certify that on November 15, 2011, a true and accurate copy of the foregoing document was filed via the Court's CM/ECF system and notification of such filing was sent to the following party:

Alexander Holmes Burke
ABurke@BurkeLawLLC.com

s/Timothy R. Carraher
Timothy R. Carraher